

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK**

Terra Finance, LLC, and
Kofi Osae-Kwapong

Plaintiffs

vs.

Acrow Corporation of America

Defendant

Civil Action No. 16-75 (SRC)

**MOTION TO WITHDRAW AS
COUNSEL**

MOTION TO WITHDRAW AS COUNSEL

Pursuant to Rule 101.2(a), Aderemilekun A. Omojola and the Law Firm of Omojola & Associates, P.C., respectfully request to withdraw from the above-captioned matter. The basis for this demand is set forth more fully in the accompanying Certification in Support of this Motion to Withdraw.

WHEREFORE, the undersigned respectfully requests the Court to grant its Motion to Withdraw.

Dated: Monday, June 20, 2016

/s/Aderemilekun A. Omojola
Aderemilekun A. Omojola, Esq..
Omojola & Associates, P.C.
30 Howe Avenue | Suite 202
Passaic | New Jersey | 07055
Tel: 973.955.4721 | Fax: 973.955.4722
aomojola@omojolalaw.com
Attorneys for Plaintiffs

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**COUNSEL’S CERTIFICATION IN
SUPPORT OF MOTION TO
WITHDRAW AS COUNSEL**

I, Aderemilekun A. Omojola, for the Motion to Withdraw my myself and the Law Firm of Omojola & Associates, P.C., from the above-captioned matter, state as follows:

1. I, and the Law Firm of Omojola & Associates, P.C., have represented Plaintiff-Terra Finance, LLC, and its president, Mr. Kofi Osae-Kwapong in the above-captioned matter since January 6, 2016, when we filed the original Complaint.

2. Due to certain discoveries, the attorney-client relationship between me and Plaintiffs, Mr. Kofi Osae-Kwapong, and Terra Finance, LLC has since deteriorated, so that it is very difficult to for me to continue representing Plaintiffs in this matter.

3. Due to several factors, the attorney-client relationship has broken down beyond repair.

4. I had advised Mr. Osae-Kwapong that if certain issues persisted I would have to withdraw, but he did not heed such advise and persisted with conduct that makes it very difficult to offer competent representation.

5. Due to the attorney-client privilege, however, it would be inappropriate, without greater cause, for me to discuss herein the details of why I seek to withdraw from representing

Plaintiffs, save to say that Mr. Osae-Kwapong has also issued a certification in support of this withdrawal.

6. For the reasons set forth herein, I humbly request that your honor grant my Motion to Withdraw from representing Plaintiffs in this matter.

7. There is a pending Motion before the court, for which I ask that this motion be stayed, so as to avoid undue prejudice to Plaintiffs' interest in this matter.

Respectfully submitted,

Dated: Monday, June 20, 2016

/s/ Aderemilekun A. Omojola
Aderemilekun A. Omojola, Esq.
Omojola & Associates, P.C.
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